

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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HD YORSTON, on Behalf of Himself and :
All Others Similarly Situated, :
Plaintiff, : Civ. No. 05 CV 10166 (PBS)
vs. :
EPIX PHARMACEUTICALS, INC., MICHAEL :
D. WEBB, PEYTON J. MARSHALL, and :
ANDREW UPRICHARD, :
Defendants. :
-----X

[Additional Captions Set Forth Below]

**MOTION OF THE TOLWIN GROUP FOR CONSOLIDATION OF
RELATED CASES, APPOINTMENT AS LEAD PLAINTIFF PURSUANT
TO §21D(a)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934
AND APPROVAL OF SELECTION OF CO-LEAD COUNSEL**

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ROBERT GREENE, Individually and on Behalf of :
All Others Similarly Situated, :
: Plaintiff, : Civ. No. 05 CV 10194 (WGY)
: vs. :
: EPIX PHARMACEUTICALS, INC., Formerly :
Known as EPIX Medical, Inc., MICHAEL D. WEBB :
PEYTON J. MARSHALL, and ANDREW :
UPRICHARD, :
: Defendants. :
-----X
JOHN C. JOHNSON JR. DEFINED BENEFIT :
PENSION PLAN, Individually and on Behalf of :
All Others Similarly Situated, :
: Plaintiff, : Civ. No. 05 CV 10272 (GAO)
: vs. :
: EPIX PHARMACEUTICALS, INC., Formerly :
Known as EPIX Medical, Inc., MICHAEL D. WEBB :
PEYTON J. MARSHALL, and ANDREW :
UPRICHARD, :
: Defendants. :
-----X

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DORAVILLE MANAGEMENT II CORP. by :
Donalz Ramirez, President, on Behalf of Himself and :
All Others Similarly Situated, :
: Plaintiff, : Civ. No. 05 CV 10288 (PBS)
: vs. :
: EPIX PHARMACEUTICALS, INC., MICHAEL :
D. WEBB, PEYTON J. MARSHALL, and :
ANDREW UPRICHARD, :
: Defendants. :
-----X
STANLEY A. KIM, on Behalf of Himself and :
All Others Similarly Situated, :
: Plaintiff, : Civ. No. 05 CV 10315 (PBS)
: vs. :
: EPIX PHARMACEUTICALS, INC., MICHAEL :
D. WEBB, PEYTON J. MARSHALL, and :
ANDREW UPRICHARD, :
: Defendants. :
-----X

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YALE TOLWIN, on Behalf of Himself and :
All Others Similarly Situated, :
: Plaintiff, : Civ. No. 05 CV 10388 (PBS)
: vs. :
: :
EPIX PHARMACEUTICALS, INC., MICHAEL :
D. WEBB, PEYTON J. MARSHALL, and :
ANDREW UPRICHARD, :
: Defendants. :
-----X

SANDRA V. BIESTERFELDT, JOHN W. :
BIESTERFELDT, CHRISTINE M. PIPER, :
DOUGLAS S. PIPER, WALTER J. SWINDELL, : Civ. No. 05 CV 10559 (PBS)
MARY M. WEBER, and SCOTT WEBER, on :
Behalf of Themselves and All Persons Similarly :
Situated :
: Plaintiff, :
: vs. :
: :
EPIX PHARMACEUTICALS, INC., MICHAEL :
D. WEBB, PEYTON J. MARSHALL, and :
ANDREW UPRICHARD, :
: Defendants. :
-----X

Movants,¹ through their undersigned counsel, hereby move this Court for an order: (i) consolidating the above captioned actions for violations of the Securities Exchange Act of 1934 (the "Exchange Act"), pursuant to Rule 42 of the Federal Rules of Civil Procedure; (ii) appointing Movants as Lead Plaintiff on behalf of purchasers of the securities of EPIX Pharmaceuticals, Inc., ("EPIX" or the "Company") during the Class Period, pursuant to Section 21D of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. §78u-4, and (iii) approving Movants' selection of Co-Lead Counsel.

This Motion is brought on the grounds that the actions filed against EPIX and the other individual defendants are substantially identical because each alleges claims for violations of the Exchange Act, and are based upon similar factual allegations against the same defendants. In addition, consolidation of these cases will promote efficiency.

This Motion is also made on the grounds that Movants believe they are the most adequate lead plaintiff, having suffered total estimated losses of \$39,088.01. In addition, Movants meet the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of class members' claims and they each will fairly and adequately represent the Class.

The facts and law supporting the Motion are fully set forth in the accompanying Memorandum of Law in Support of the Motion of the Tolwin Group for Consolidation of

¹ Movants are: Yale Tolwin, Walter J. Swindell, Douglas S. and Catherine M. Piper, Peter Kersloot, Rod Rogers, James E. Kohl, and Mary M. and Scott Weber.

Related Cases, Appointment as Lead Plaintiff and Approval of Selection of Co-Lead Counsel.

Dated: March 28, 2005

Respectfully submitted,

GILMAN AND PASTOR, LLP

/s/Douglas M. Brooks

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**Proposed Co-Lead Counsel For
Plaintiffs and The Class**